

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

MMS:LXN F. #2010R00132, 2015R00498, 2015R0499

271 Cadman Plaza East Brooklyn, New York 11201

March 30, 2017

## By FedEx and ECF

Richard Kestenbaum, Esq. 40 Cutter Mill Road Great Neck, NY 11021

Sarita Kedia, Esq. Sarita Kedia Law Offices, P.C. 5 East 22nd Street, Suite 7B New York, NY 10010

Henry Mazurek, Esq. Clayman & Rosenberg 305 Madison Avenue New York, NY 10165

Re: United States v. Laraine Castellano, et al.

Criminal Docket No. 15-523 (NGG)

## Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, please find enclosed with this letter the following discovery in the above-listed matter: Flash Drive containing documents Bates-marked EDNY-000198429 – EDNY-000199901¹ and recordings Bates-marked EDNY-R16 – EDNY-R18.² Please also find enclosed a copy of an updated index to the government's disclosures. The password for the Flash Drive will be mailed in a separate letter.

<sup>&</sup>lt;sup>1</sup> Quickbook files can be found within EDNY-000199901, "United Bus" folder.

This disclosure supplements the discovery previously produced to you on November 2, 2015, January 13, 2016 and February 8, 2016 and August 19, 2016. The government reiterates its request for reciprocal discovery from the defendants.

Very truly yours,

BRIDGET M. ROHDE Acting United States Attorney

By: /s/ Lan Nguyen
Lan Nguyen
Marisa M. Seifan
Assistant U.S. Attorneys
(718) 254-6162/6008

## Enclosures

cc: Clerk of the Court (NGG) (by ECF) (without enclosures)